

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

JESSICA HICKLIN,

Plaintiff,

v.

GEORGE LOMBARDI,
et al.,

Defendants.

Case No. 4:16-CV-01357-NCC

PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION

Pursuant to Rule 65 of the Federal Rules of Civil Procedure, Plaintiff Jessica Hicklin, by and through her attorneys, moves this Court for the issuance of a preliminary injunction that: (1) directs Defendants to provide Ms. Hicklin with medically necessary treatment for gender dysphoria, including but not limited to providing her hormone therapy, access to permanent body hair removal, and access to gender-affirming canteen items, and (2) enjoining Defendants from enforcing the policies, customs, or practices that have served as a moving force behind their constitutional violations by denying inmates with gender dysphoria individualized medically necessary treatment and care, contrary to widely accepted standards of care and the recommendations of Ms. Hicklin's treating mental health professionals.

The grounds for this Motion are set forth in the accompanying Memorandum of Law. Plaintiff also respectfully refers the Court to her Complaint for Declaratory and Injunctive Relief, the Declaration of Dr. Randi C. Ettner, the Declaration of Dr. Meredith L. Throop, and the Declaration of Demoya R. Gordon.

Ms. Hicklin respectfully requests oral argument on this Motion, which will assist the Court in resolving the issues presented.

Date: April 4, 2017

Respectfully submitted,

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CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that service of the foregoing Motion for Preliminary Injunction was made on April 4, 2017 via the Court's CM/ECF system to:

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